

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

ANGELE A. OZOEMELAM,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 07-804 (SLR)
	)	
DELAWARE STATE UNIVERSITY,	)	
an institution of higher education and	)	
corporate body; ALLEN L. SESSOMS,	)	
individually and in his official capacity	)	
and as President of Delaware State	)	
University; MARK FARLEY, individually	)	
and in his official capacity as Vice President	)	
for Human Resources and Legislative	)	
Affairs of Delaware State University;	)	
and DONALD HENRY, individually and	)	
in his official capacity as Vice President	)	
for Business and Finance of Delaware	)	
State University,	)	
	)	
Defendants.	)	

**MOTION TO DISQUALIFY PLAINTIFF'S COUNSEL**

Defendant Delaware State University ("the University") and individual defendants Allen Sessoms, Mark Farley and Donald Henry, by and through their undersigned counsel, hereby move to disqualify the law firm of Schmittinger & Rodriguez, P. A. from representation of plaintiff Angele Ozoemelum in this action due to a conflict of interest in violation of the Model Rules of Professional Conduct. The reasons for this Motion are set forth in Defendants' Opening Brief in Support of its Motion to Disqualify, filed concurrently herewith.

Respectfully submitted,

POTTER ANDERSON & CORROON LLP

By: /s/ Sarah E. DiLuzio

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Attorneys for Defendants  
Delaware State University, Allen Sessoms,  
Mark Farley and Donald Henry

Dated: February 1, 2008  
842962

**CERTIFICATE OF SERVICE**

I hereby certify this 1st day of February 2008, that the foregoing was electronically filed with the Clerk of the Court using CM/ECF which will send notification of such filing to the following counsel of record that the document is available for viewing and downloading from CM/ECF:

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and DONALD HENRY, individually and	)	
in his official capacity as Vice President	)	
for Business and Finance of Delaware	)	
State University,	)	
	)	
Defendants.	)	

**LOCAL RULE 7.1.1 CERTIFICATION**

Counsel for Defendants Delaware State University, Allen Sessoms, Mark Farley and Donald Henry certifies that opposing counsel was contacted in an effort to reach agreement on the matters set forth in this Motion. Counsel for Plaintiff was unwilling to agree to the relief requested.

POTTER ANDERSON & CORROON LLP

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Dated: February 1, 2008  
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